

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
JASPER DIVISION**

KIMBERLY NEAL LEE,

)

)

Plaintiff,

)

)

vs.

)

)

CLYDE DRIVER,

)

)

Defendant.

)

**CIVIL ACTION NO.
6:12-CV-1707**

**PLAINTIFF'S OPPOSED MOTION FOR ENLARGEMENT OF TIME TO
RESPOND TO DEFENDANT'S MOTIONS TO STRIKE**

COMES NOW the Plaintiff, **Kimberly Neal Lee**, by and through counsel, and moves this Court to enlarge time to respond to Defendant's Motions to Strike (Dkt #34 & #35), and in support thereof would show unto the Court the following:

I.

Defendant filed a *Motion to Strike Plaintiff's Statement of Facts* (Dkt #34) and a *Motion to Strike Plaintiff's Evidence in Opposition to Defendant's Motion for Summary Judgment* (Dkt #35) on the 22nd ay of July, 2013.

II.

Plaintiff would show unto the Court that he has been in several trials over the last week and has not had sufficient time to respond to said Motions.

III.

Plaintiff would show unto the Court that by phone call of this date, counsel for

Defendant indicated that he opposes Plaintiff's request for time. However, Plaintiff would show unto the Court that none of the parties would be prejudiced by a brief extension of time in this cause.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that she be granted an additional fourteen (14) days to respond to Defendant's Motions to Strike (Dkt #34 & #35) in this cause.

RESPECTFULLY SUBMITTED, this the 29th day of July, 2013.

BY: s/T.K. Moffett
T.K. MOFFETT (ALB#: 6766-T82T)
Attorney for Plaintiff

OF COUNSEL:

MOFFETT LAW FIRM, PLLC
ATTORNEYS AT LAW
330 NORTH BROADWAY STREET
PO BOX 1707
TELEPHONE: (662) 844-0836
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CERTIFICATE OF SERVICE

This is to certify that I, **T.K. Moffett**, have this day filed the above and foregoing ***PLAINTIFF'S OPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT'S MOTIONS TO STRIKE*** using the ECF system which sent notification to the following:

Hon. Charles E. Harrison
Hon. H. Gregory Pearson
Hon. Samuel W. Junkin
Junkin, Pearson, Harrison, Junkin & Pate, LLC
Post Office Box 3119
Tuscaloosa, AL 35403
chuck@jphj.net; hgpearson@bellsouth.net; sam@jphj.net

This the 29th day of July 2013.

s/T.K. Moffett